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25 Attorneys for Apex Clearing Corp.

26 UNITED STATES DISTRICT COURT  
27 NORTHERN DISTRICT OF CALIFORNIA  
28 SAN FRANCISCO DIVISION

29 SABRINA CLAPP and DENISE REDFIELD,  
30 individually and on behalf of others similarly  
31 situated,

32 Plaintiffs,

33 v.

34 ALLY FINANCIAL INC.;  
35 ALPACA SECURITIES LLC;  
36 CASH APP INVESTING LLC;  
37 SQUARE INC.;  
38 DOUGH LLC;  
39 MORGAN STANLEY SMITH BARNEY  
40 LLC;  
41 E\*TRADE SECURITIES LLC;  
42 E\*TRADE FINANCIAL CORPORATION;

Case No. 3:21-cv-00896-VC

**DEFENDANT APEX CLEARING  
CORPORATION'S CORPORATE  
DISCLOSURE STATEMENT**

1 E\*TRADE FINANCIAL HOLDINGS, LLC;  
2 ETORO USA SECURITIES, INC.;  
3 FREETRADE, LTD.;  
4 INTERACTIVE BROKERS LLC;  
5 M1 FINANCE, LLC;  
6 OPEN TO THE PUBLIC INVESTING, INC.;  
7 ROBINHOOD FINANCIAL, LLC;  
8 ROBINHOOD MARKETS, INC.;  
9 ROBINHOOD SECURITIES, LLC;  
10 IG GROUP HOLDINGS PLC;  
11 TASTYWORKS, INC.;  
12 TD AMERITRADE, INC.;  
13 THE CHARLES SCHWAB CORPORATION;  
14 CHARLES SCHWAB & CO. INC.;  
15 FF TRADE REPUBLIC GROWTH, LLC;  
16 TRADING 212 LTD.;  
17 TRADING 212 UK LTD.;  
18 WEBULL FINANCIAL LLC;  
19 FUMI HOLDINGS, INC.;  
20 STASH FINANCIAL, INC.;  
21 BARCLAYS BANK PLC;  
22 CITADEL ENTERPRISE AMERICAS, LLC;  
23 CITADEL SECURITIES LLC;  
24 MELVIN CAPITAL MANAGEMENT LP;  
25 SEQUOIA CAPITAL OPERATIONS LLC;  
26 APEX CLEARING CORPORATION;  
27 THE DEPOSITORY TRUST & CLEARING  
28 CORPORATION,

Defendants.

### **DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel for Defendant Apex Clearing Corporation hereby certifies that Apex Clearing Holdings LLC and PEAK6 Investments LLC are parent corporations of Apex Clearing Corporation. Apex Clearing Corporation further certifies that no publicly held corporation has a 10% or greater ownership interest in Apex Clearing Corporation.<sup>1</sup>

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<sup>1</sup> Apex Clearing Corporation has not yet responded to the Complaint in this matter. In filing this Statement, Apex Clearing Corporation does not waive, and instead expressly preserves, all rights, privileges, immunities, affirmative defenses, and other defenses, including all defenses based upon the lack of personal jurisdiction over it.

Respectfully submitted,

Dated: March 5, 2021

By: /s/ Heather M. Burke  
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Attorneys for Apex Clearing Corp.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2021, the within document was filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to the attorneys of record in this case.

Executed: March 5, 2021

/s/ Heather M. Burke

Heather M. Burke